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Attorneys for Defendants Rimini Street, Inc., and Seth Ravin

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ORACLE USA, INC., a Colorado corporation;
ORACLE AMERICA, INC., a Delaware
corporation; and ORACLE INTERNATIONAL
CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation
and SETH RAVIN, an individual,

Defendants.

Case No. 2:10-cv-0106-LRH-PAL

**DECLARATION OF ROBERT LACHS
IN SUPPORT OF DEFENDANTS
RIMINI STREET, INC.'S AND SETH
RAVIN'S OPPOSITION TO ORACLE'S
MOTION TO RE-DESIGNATE
RIMINI'S 2006-2011 CUSTOMER LIST**

Trial Date: **September 14, 2015**

DECLARATION OF ROBERT LACHS

I, Robert Lachs, am over the age of eighteen, am competent to testify, have personal knowledge of the facts stated below, and, under penalty of perjury hereby declare:

1. I am employed by Rimini Street, Inc. as Vice President of Sales. I have been in this role at Rimini since 2010. In this role, my responsibilities include the negotiation of Rimini's Support Services Agreements, which requires me to interact with new and potential Rimini clients on a daily basis.

2. Rimini's Support Services Agreements [REDACTED]
While clients can cancel their Rimini maintenance service prior to the expiration of the contract's full term, the majority of Rimini's clients [REDACTED]

3. Because of my responsibilities in negotiating Rimini's Support Services Agreements, I am aware that these agreements contain standard language. [REDACTED]

[REDACTED] An example of the standard language is provided below:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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[illegible]

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7
8 4. Rimini also requests the right to disclose the client's relationship with Rimini publically, as
9 illustrated by the below standard language from the client's agreement:
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 5. [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 6. [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25
26 7. Based on my personal experience over the last 5 years working directly with Rimini's clients
27 and prospective clients, the disclosure of Rimini's entire client list to Oracle's executives would
28 cause competitive harm and/or business injury to Rimini [REDACTED]
[REDACTED]

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 I declare under penalty of perjury under the laws of the United States that the foregoing is true
5 and correct.
6
7

8 Executed on August 24, 2015.

9 /s/Robert Lachs
10 Robert Lachs
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